

1 Mark C. Mao, CA Bar No. 236165
2 Beko Reblitz-Richardson, CA Bar No. 238027
3 **BOIES SCHILLER FLEXNER LLP**
4 44 Montgomery St., 41st Floor
5 San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsfllp.com
richardson@bsfllp.com

6 James Lee (admitted *pro hac vice*)
7 Rossana Baeza (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
8 100 SE 2nd St., 28th Floor
Miami, FL 33131
9 Tel.: (305) 539-8400
jlee@bsflp.com
10 rbaeza@bsflp.com

11 Amanda K. Bonn, CA Bar No. 270891
12 **SUSMAN GODFREY L.L.P**
13 1900 Avenue of the Stars, Suite 1400
14 Los Angeles, CA 90067
15 Tel: (310) 789-3100
Fax: (310) 789-3150
abonn@susmangodfrey.com

16 || Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL
CATALDO, EMIR GOENAGA, JULIAN
SANTIAGO, HAROLD NYANJOM,
KELLIE NYANJOM, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

24 || Plaintiffs,

25 | VS.

26 | GOOGLE LLC

Defendant.

William Christopher Carmody
(admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander P. Frawley
(admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas,
32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
Michael F. Ram (admitted *pro hac vice*)
Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com
mram@forthepeople.com
ramen@forthepeople.com

Case No.: 3:20-cv-04688

ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

Magistrate Judge Alex G. Tse
Courtroom A – 15th Floor
Trial Date: Not Yet Set

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC's ("Google") material should be sealed. The material is included within the Joint
 3 Letter Brief Regarding Plaintiffs' Request for Google to Use Additional Search Terms ("Search
 4 Term Joint Letter Brief").

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Search Term Joint Letter Brief	Google	Portions highlighted in teal on pages 2, 3, 5	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit C to the Search Term Joint Letter Brief	Google	Portions highlighted in teal on pages 1, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

15 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 16 responsibility to establish that its designated material is sealable.

17 Dated: January 7, 2022

18 Respectfully submitted,

19 By: /s/ Amanda Bonn

20 Amanda Bonn (CA Bar No. 270891)
 21 abonn@susmangodfrey.com
 22 SUSMAN GODFREY L.L.P.
 23 1900 Avenue of the Stars, Suite 1400
 24 Los Angeles, CA 90067
 25 Telephone: (310) 789-3100

26 Mark C. Mao (CA Bar No. 236165)
 27 mmao@bsflp.com
 28 Beko Rebitz-Richardson (CA Bar No. 238027)
 brichardson@bsflp.com
 BOIES SCHILLER FLEXNER LLP
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Telephone: (415) 293 6858

1 Facsimile (415) 999 9695
2

3 Jesse Panuccio (admitted *pro hac vice*)
4 jpanuccio@bsflp.com
5 BOIES SCHILLER FLEXNER LLP
6 1401 New York Ave, NW
7 Washington, DC 20005
8 Tel.: (202) 237-2727
9 Fax: (202) 237-6131
10

11 James Lee (admitted *pro hac vice*)
12 jlee@bsflp.com
13 BOIES SCHILLER FLEXNER LLP
14 100 SE 2nd Street, Suite 2800
15 Miami, FL 33131
16 Telephone: (305) 539-8400
17 Facsimile: (305) 539-1307
18

19 William Christopher Carmody (*pro hac vice*)
20 bcarmody@susmangodfrey.com
21 Shawn J. Rabin (*pro hac vice*)
22 srabin@susmangodfrey.com
23 Steven Shepard (*pro hac vice*)
24 sshepard@susmangodfrey.com
25 Alexander P. Frawley (*pro hac vice*)
26 afrawley@susmangodfrey.com
27 SUSMAN GODFREY L.L.P.
28 1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330
29

30 John A. Yanchunis (*pro hac vice*)
31 jyanchunis@forthepeople.com
32 Ryan J. McGee (*pro hac vice*)
33 rmcgee@forthepeople.com
34 Michael F. Ram (*pro hac vice*)
35 mram@forthepeople.com
36 Ra O. Amen (*pro hac vice*)
37 ramen@forthepeople.com
38 MORGAN & MORGAN, P.A.
39 201 N Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
Facsimile: (813) 222-4736
40

41 *Attorneys for Plaintiffs*
42
43